

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION

IN RE: HAINES C. BROWN, IV	)	
KARYN P. BROWN	)	CHAPTER 13
<b><u>Debtor(s)</u></b>	)	
	)	CASE NO. 19-16896-PMM
EXTER FINANCE LLC	)	
<b><u>Moving Party</u></b>	)	11 U.S.C. 362
	)	
v.	)	HEARING DATE: <b><u>9-28-21 at 10:00 AM</u></b>
	)	
HAINES C. BROWN, IV	)	
KARYN P. BROWN	)	
<b><u>Respondent(s)</u></b>	)	
	)	
SCOTT F. WATERMAN	)	
<b><u>Trustee</u></b>	)	

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE**

Exeter Finance LLC has filed a Motion For Relief From The Automatic Stay with the Court for relief from the automatic stay of 11 U.S.C. 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **September 22, 2021** you or your attorney must do all of the following:

(a) file an answer explaining your position at:  
United States Bankruptcy Court  
The Gateway Building  
201 Penn Street  
Reading, PA 19601

If you mail an answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:  
Morton & Craig LLC  
Attn.: William E. Craig, Esquire  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **September 28, 2021 at 10:00 am** in United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 9/7/21

/s/ William E. Craig  
William E. Craig, Esquire  
Morton & Craig LLC  
Attorney for Exeter Finance LLC